

Erik F. Stidham (Idaho Bar No. 5483) (Admitted pro hac vice)

HOLLAND & HART LLP
800 W. Main Street, Suite 1750
Boise, ID 83702-7714
Telephone: (208) 342-5000
efstidham@hollandhart.com

Engels Tejeda (11427)
Benjamin D. Passey (19234)
HOLLAND & HART LLP
222 S. Main Street, Suite 2200
Salt Lake City, UT 84101
Telephone: (801) 799-5800
ejtejeda@hollandhart.com
bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:	Bankruptcy No. 24-23530
AMMON EDWARD BUNDY,	Chapter 7
Debtor.	Honorable William T. Thurman

**RESPONSE TO NOTICE OF IMPOSSIBILITY OF COMPLIANCE WITH JULY 21
DEADLINE, REQUEST FOR MODIFICATION OF ORDER, AND DECLARATION
OF AMMON EDWARD BUNDY**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth,
Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), by and
through their counsel, submit this Response to Notice of Impossibility of Compliance with July
21 Deadline, Request for Modification of Order, and Declaration of Ammon Edward Bundy (the

“Notice”), served by Debtor Ammon Bundy (“Debtor Bundy”) on counsel for the St. Luke’s Creditors via email on June 21, 2025. As of the time of this filing, the Notice has not yet been filed in the docket of the case.

St. Luke’s Creditors are in receipt of Debtor’s Notice, which outlines practical difficulties Debtor asserts regarding retrieval of documents stored in the 53-foot moving trailer by the current deadline of today, July 21, 2025, including alleged weather conditions and other logistical challenges.

St. Luke’s Creditors at first withdrew the production request as to the documents in the trailer only when Debtor sought pre-payment of estimated expenses (Application for Costs and Expenses, Dkt. 457), instead of obtaining the documents and then submitting his actual reasonable expenses, as ordered by the Court. *See* Order Granting and Modifying the St. Luke’s Creditors’ Second Motion to Compel and Denying Debtor’s Motion To Quash, Dkt. 451. On July 15, 2025, the Court entered an Order Denying debtor’s Application for Costs and Expenses, further clarifying that Debtor may only seek costs and expenses “after producing all responsive documents to the St. Luke’s Creditors[.]” Dkt. 463 at 1.

Debtor Bundy has now, through his Notice, indicated that he will comply with the Court’s prior orders, and obtain the documents from the trailer and *then* submit his actual expenses if he is permitted an additional 14-days to do so. *See* Notice at 2.

Provided the foregoing, St. Luke’s Creditors agree to extend the deadline for production of documents ***stored in the trailer only*** to July 30, 2025, provided that Debtor makes all necessary arrangements to retrieve said documents by that date and thereafter submits reasonable expenses for reimbursement as ordered by the Court.

This accommodation regarding trailer documents does not excuse Debtor's obligation to comply with all other aspects of the Court's discovery orders. Thus, the July 21, 2025 deadline remains in full force and effect for all other documents that Debtor is required to produce pursuant to the Court's orders.

DATED this 21st day of July, 2025.

HOLLAND & HART LLP

/s/ Erik F. Stidham

Erik F. Stidham (Idaho Bar No. 5483)

HOLLAND & HART LLP

800 W. Main Street, Suite 1750

Boise, ID 83702-7714

Telephone: (208) 342-5000

efstidham@hollandhart.com

rfaucher@hollandhart.com

/s/ Engels Tejeda

Darren G. Reid (11163)

Engels Tejeda (11427)

Benjamin D. Passey (19234)

HOLLAND & HART LLP

222 S. Main Street, Suite 2200

Salt Lake City, UT 84101

Telephone: (801) 799-5800

dgreid@hollandhart.com

ejtejeda@hollandhart.com

bdpassey@hollandhart.com

*Attorneys for St. Luke's Health System, Ltd.,
St. Luke's Regional Medical Center, Ltd.,
Chris Roth, Natasha D. Erickson, M.D., and
Tracy W. Jungman, NP*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of July, 2025, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

Ammon Edward Bundy, *pro se*
P.O. Box 1062
Cedar City, UT 84721

Ammon Edward Bundy
896 E 400 S
New Harmony, UT 84757

By E-Mail:

Ammon E. Bundy
aebundy@bundyfarms.com

/s/ Erik F. Stidham
for Holland & Hart LLP